

1 GARRY L. HAYES, ESQ.
2 Nevada State Bar No. 1540
3 LARSON A. WELSH, ESQ.
4 Nevada State Bar No. 12517
5 LAW OFFICE OF HAYES & WELSH
6 199 North Arroyo Grande Blvd., Suite 200
7 Henderson, Nevada 89074
8 Lwelsh@lqlaw.com; L.finchio@nevlaw.com
9 Phone: 702-434-3444
10 Fax: 702-434-3739
11 *Attorneys for Plaintiff, CHERYL FORD*

12 UNITED STATES DISTRICT COURT

13 DISTRICT OF NEVADA

14 Case No.: 2:14-cv-02206-APG-GWF

15 CHERYL FORD, an individual,
16 Plaintiff,

17 vs.

18 ADVANTAGE PLUS CONSULTING, INC., a
19 Nevada corporation as successor in interest to
20 AFRC, Inc., a Nevada corporation; DOES I-X;
21 individually; and ROE CORPORATIONS I-X,

22 **ORDER ALLOWING EXAMINATION
OF JUDGMENT DEBTOR, ADVANTAGE
PLUS CONSULTING, INC.**

23 Defendants.

24 Pursuant to Plaintiff/Judgment Creditor's *Application for Order Allowing*
25 *Examination of Judgment Debtor, Advantage Plus Consulting, Inc.*, and the Court having
26 reviewed the papers and pleadings on file herein, and good cause appearing:

27 IT IS HEREBY ORDERED that ANTHONY ALONSO, President, Secretary and
28 Treasurer of the corporate Defendant and as the person most knowledgeable for Defendant,
ADVANTAGE PLUS CONSULTING, INC., appear before Plaintiff's attorney of record, the
Law Office of Hayes & Welsh, located at 199 N. Arroyo Grande Blvd., Ste. 200, Henderson,

1 NV 89074 on March 21, 2018, at 9:30 a.m., and on such further days as Judgment Creditor
2 may name, to testify under oath concerning Judgment Debtor's property;

3 IT IS FURTHER ORDERED that ANTHONY ALONSO as the person most
4 knowledgeable for Defendant, shall bring all of the documents listed on attached Exhibit 1 to
5 the Judgment Debtor Examination and shall make such documents available for Plaintiff's
6 counsel for inspection and copying;

7 IT IS FURTHER ORDERED that the document production required herein applies to
8 Defendant, ADVANTAGE PLUS CONSULTING, INC., individually and to any business in
9 which it has an ownership interest. SAID JUDGMENT DEBTOR IS HEREBY
10 FORBIDDEN IN THE INTERIM FROM DISPOSING OF ANY PROPERTY NOT
11 EXEMPT FROM EXECUTION, INCLUDING ANY AND ALL CASH INFUSIONS
12 RECEIVED BY JUDGMENT DEBTOR. Failure to appear at the time and place as stated
13 above may result in a bench warrant being issued for your arrest; and

14 IT IS FURTHER ORDERED that this Order shall be regularly served upon Debtor
15 personally, or upon Debtor's counsel of record.

16 IT IS SO ORDERED:
17

18 
19 _____
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 2/26/2018

22 Submitted by:

23 LAW OFFICE OF HAYES & WELSH

24 /s/Larson A. Welsh
25 LARSON A. WELSH, ESQ.
26 Nevada State Bar No. 12517
27 199 North Arroyo Grande Blvd., Suite 200
Henderson, Nevada 89074
Attorneys for Plaintiff, CHERYL FORD

EXHIBIT 1

All of the documents listed below apply to the debtor personally and the debtor's spouse:

1. Your social security number and a copy of your driver's license.
2. All passports used for travel outside of the United States.
3. Federal and state income tax returns, W-2 forms, 1099 forms, and any quarterly estimates of federal or state income taxes, for the last **four years**, including but not limited to requests for extensions to file.
4. Any and all documents and records of checking, savings, or any other type of account, foreign or domestic, held by you or jointly with any other person, with any type of financial institution during the last **four years**, including but not limited to monthly account statements, checks, check registers, check stubs, cancelled checks, and deposit slips.
5. All keys and documents related to any and all safe deposit boxes or other secured vault, whether privately maintained or in any financial institution, belonging to you, or in which you have, or have had an interest whatsoever, either alone or jointly, with any other person or persons for the last **four years**, and all documents relating to that safe deposit box/secured vault.
6. Any and all signature cards that name you as an authorized signatory on any financial account, for any entity or other third party, for the last **four years**.
7. Any and all documents describing and identifying any brokerage accounts, stocks, bonds, money market accounts, debentures, certificates of deposit, mutual funds, or any other investment vehicle owned by you or held for your benefit for the last **four years**.
8. Any and all documents related to any account in which your earnings or other income have been deposited into in the last **four years**, whether you continue to have an interest in it or not.
9. Any and all documents evidencing any application signed by you, on your behalf, by your spouse and/or children, to open a foreign or offshore financial account, in your name or any other name.
10. Any and all documents related to an IRA, 401K, pension, annuity or any other retirement account owned by you or held for your benefit, including but not limited to contracts, statements, contribution records, distribution records, copies of loans taken from your accounts, and copies of any and all bills or living expenses paid for with distributions. Failure to provide these documents will allow Judgment Creditor to assume that any funds obtained are not exempt retirement benefits.

11. Any and all documents related to real property in which you hold an ownership interest, whether held in your name or any other name, for the last **four years**, including but not limited to mortgage applications, contracts, deeds, deeds of trust, liens, closing statements, credit reports, title insurance policies, appraisals/valuations and mortgage/loan statements.
12. Any and all documents evidencing lease agreements, listing agreements, rent rolls or other contracts for real property in which you hold an ownership interest, whether held in your name or any other name, for the last **four years**.
13. Any and all documents evidencing lease agreements or other contracts for real property not owned by yourself but for which you make lease payments as a tenant or on behalf of someone else.
14. Any and all checks, receipts, deeds, or other evidence of the sale or transfer of any real property in which you had a legal or equitable interest, within the last **four years**.
15. Any and all documents evidencing that you hold title to real property as trustee for any other person or entity.
16. Any and all documents evidencing any time-shares that you enjoy the use of.
17. Copies of all titles, certificates of title, registrations, bills of sale, sale contracts, loan contracts, and loan statements for personal property which you have enjoyed the use of, or in which you have had any legal or equitable interest whatsoever alone or jointly with any other person or persons, including but not limited to automobiles, boats, trucks, watercraft, motorcycles, four-wheelers, recreational vehicles, go-karts, aircraft, motorhomes, campers, trailers, agricultural equipment, or construction equipment, for the last **four years**.
18. Any and all notes receivable, pledges or security interests in your favor, for the last **four years**.
19. Copies of all fire, burglary, automobile, personal property casualty, collision, risk and extended coverage insurance policies, or any other insurance policies or riders that have insured any property in which you have had any interest whatsoever either alone or jointly with any other person or persons (including copies of insurance inventories), for the last **four years**.
20. Any and all documents evidencing claims made by you or on your behalf under any insurance policies in the last **four years**.
21. A list of household furnishings and fixtures that have been purchased within the last year that had a purchase price of \$999 or more.

22. A list and valuation of all collectibles (i.e. stamps, coins, sports cards, books, comic books, records, etc.) that you now own or have owned within the last **four years**.
23. Any and all documents that refer to, or relate to any musical instruments, guns, jewelry, antiques, art, paintings or similar assets, owned by yourself or in your possession within the last **four years**.
24. Any and all documents evidencing any interest you may have in any licenses, patents, trademarks, trade names, copyrights, franchises, royalties of any kind, country club memberships, season tickets, oil and gas rights, timber rights, mining claims, development work or mineral rights, for the last **four years**.
25. Any and all information regarding any employment, as an employee or independent contractor, you have had during the last **four years**, including but not limited to, employment or consulting contracts, policy manuals, benefit handbooks, and pay/check stubs regarding such employment, whether full-time, part-time, commissioned or otherwise.
26. Any and all documents related or referring to stock options or profit-sharing plans held by you or for your benefit.
27. Any and all documents that evidence a cash value in any life insurance policy for you or for which you are a beneficiary, and copies of all policies whether term, whole life or universal.
28. Any and all documents reflecting or related to any trusts, wherein you are a grantor, settlor, beneficiary, or trustee, including but not limited to creation documents, amendments, and conveyances to or from the trust, for the last **four years**.
29. Copies of all pre-nuptial agreements, post-nuptial agreements, and separate property agreements, for which you were a signatory, including a list of assets and liabilities to be held separately.
30. Copies of all wills for which you were/are a signatory or beneficiary.
31. Any and all credit card statements, for all cards under your name or for which you are an authorized user, for the last **two years**.
32. All documents referring or reflecting the name and address of any storage facility or mini-warehouse to which you have access or which contain property to which you hold an interest, including but not limited to storage contracts, invoices, and insurance policies.
33. Any and all documents evidencing notes, contracts, negotiable instruments, receivables or accounts receivable whether due or not due belonging to you or in

which you have had any interest whatsoever either alone or jointly with any other person or persons for the last **four years**.

34. A list of all clients, customers, accounts, accounts receivable, and persons that owe you money, including contact information and amount owed.
35. All general ledgers, accounting journals, financial statements or other financial records prepared or maintained for the last **four years**.
36. Any and all documents related to any money owed by you to someone else, including but not limited to correspondence from collection agencies and attorneys.
37. Any and all documents evidencing transfers/gifts of money or property over \$500 in value to or from you over the last **four years**.
38. Copies of any and all professional licenses that are held by you.
39. Copies of all divorce decrees and any affidavits submitted in those proceedings.

If you own the stock of an incorporated business entity, or have been a partner, officer, director, manager, managing member, member, owner, signatory on a bank account, or registered agent of a business entity within the last four years, you are required to bring with you (as regards to the said business entities), the following documents:

1. Any and all corporate records, including but not limited to corporate charters, articles, minutes, resolutions, by-laws, and stock/membership transfer ledgers, for the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest) during the last **four years**.
2. Copies of any partnership or joint venture agreements and all correspondence related thereto.
3. All local, state and federal tax returns filed by the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest) in the last **four years**, including but not limited to all attachments, schedules, W-2's, K-1's, 1099 and 1098 forms.
4. Any and all documents and records of checking, savings, or any other type of account, foreign or domestic, held by the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest) with any type of financial institution during the last **four years**, including but not limited to monthly account statements, checks, check registers, check stubs, cancelled checks, and deposit slips.
5. Copies of any and all documents whereby you acquired or disposed of an interest in any businesses within the last **four years**.

6. Lists of all customers, clients, etc. of any kind with which the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest) does business or has done business during the last **four years**.
7. All documents referring, relating or pertaining to any records of salaries, commissions, bonuses, income from employment, wages, pay stubs, dividends, royalties, allowances, expenses or other sums of money paid to you within the last **four years**.
8. All general ledgers, accounting journals, financial statements or other financial records prepared or maintained during the last **four years** for each business entity (or any subsidiary or other entity in which such corporation holds an ownership interest).
9. Copies of all titles, certificates of title, registrations, bills of sale, sale contracts, loan contracts, and loan statements for personal property owned by the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest), including but not limited to automobiles, boats, trucks, watercraft, motorcycles, four-wheelers, recreational vehicles, go-karts, aircraft, motorhomes, trailers, agricultural equipment, or construction equipment, for the last **four years**.
10. Any and all documents related to real property in which the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest) has or had an ownership interest, for the last **four years**, including but not limited to mortgage applications, contracts, deeds, deeds of trust, closing statements, credit reports, title insurance policies, appraisals/valuations and mortgage/loan statements.
11. Copies of any notes owed to the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest).
12. Copies of all accounts receivable documents for the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest), both current and for **one year** prior to the date of this Order.
13. A copy of any and all leases regarding any real estate or other property not owned by the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest), but for which regular monthly lease payments are being made by the business entity (or any subsidiary or other entity in which such corporation holds an ownership interest).